

AO 91 (Rev. 11/11) Criminal Complaint

AUSA Abigail Peluso (312) 353-5342

AUSA Erika Csicsila (312) 353-5370

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**FILED**MAY 11 2016 *GW*

UNITED STATES OF AMERICA

v.

BENJAMIN BIANCOFIORI  
also known as "Beanz"CASE NUMBER:  
UNDER SEALTHOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT**16CR 306**

MAGISTRATE JUDGE GILBERT

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

In or about February 2016, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendant violated:

*Code Section**Offense Description*Title 18, United States Code, Section  
1591(a)sex trafficking of Victim C by force, fraud, or  
coercion

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

Sworn to before me and signed in my presence.

Date: May 11, 2016

City and state: Chicago, Illinois

*Helen Dunn*

HELEN DUNN

Special Agent, Federal Bureau of Investigation  
(FBI)*Jeffrey Gilbert**Judge's signature*

JEFFREY GILBERT, U.S. Magistrate Judge

*Printed name and Title*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

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**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT,  
ARREST WARRANT, AND SEARCH WARRANT**

I, HELEN DUNN, being duly sworn, state as follows:

1. I am Special Agent with the Federal Bureau of Investigation. I have been so employed for approximately <sup>13 1/2</sup>~~12~~ years. As part of my duties as an FBI Special Agent, I investigate criminal violations relating to violent crimes, including sex trafficking in violation of 18 U.S.C. § 1591. I have participated in a number of criminal investigations, some of which involved the use of the Internet, email, and other social media to further criminal activity. I have participated in the execution of multiple federal search warrants as well.

2. This affidavit is made in support of a criminal complaint and application for a warrant to arrest BENJAMIN BIANCOFIORI for sex trafficking by force, fraud, and coercion, in violation of 18 U.S.C. § 1591. I also submit this affidavit in support of an application for a warrant to search the premises located at 1913 Golden Gate, Naperville, Illinois (the "**Subject Premises**"), as further described in Attachment A. This affidavit is based upon my personal knowledge, information provided to me by other law enforcement officers, interviews of witnesses, cellular phone records, consensually recorded conversations, and records obtained from multiple sources, including social media outlets.

3. Because this affidavit is being submitted for the limited purpose of establishing probable cause (1) in support of a criminal complaint charging

BIANCOFIORI with the sex trafficking of Victim C by force, fraud, and coercion, and (2) that evidence, instrumentalities, fruits, and contraband related to this criminal conduct will be found at the **Subject Premises**, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that BIANCOFIORI committed the offense alleged in the complaint and probable cause to search the **Subject Premises**.

4. Based on the information set forth below, there is probable cause to believe that BIANCOFIORI has engaged in sex trafficking by force, fraud, and coercion, in violation of 18 U.S.C. § 1591, and that evidence, instrumentalities, fruits, and contraband related to this criminal conduct, as further described in Attachment B, will be found at the **Subject Premises**.

## **FACTS SUPPORTING PROBABLE CAUSE**

### **A. Background and Summary of the Investigation**

5. Beginning in or around February 2016, the FBI began investigating allegations that BENJAMIN BIANCOFIORI and others were engaging in the sex trafficking of women in the Chicago area and elsewhere by force, fraud, and coercion. The investigation has shown that BIANCOFIORI is a pimp who, between 2007 and the present, has trafficked numerous adult women, including Victim A, Victim B, Victim C, Victim D, Victim E, and other women known and unknown, by force, fraud, and coercion. At times, BIANCOFIORI recruited women to engage in commercial sex acts on his behalf using the messaging service available through his



Facebook account, which contained the user name “Ben Beanz Biancofiiori” and the URL address <http://www.facebook.com/ben.biancofiiori> (the “Biancofiiori Facebook Account”).<sup>1 2</sup>

6. As explained below, the investigation has also shown that BIANCOFIORI advertised the women who engaged in commercial sex acts on his behalf in online commercial sex advertisements on the websites Craigslist.com and Backpage.com, and that each of the Backpage.com advertisements linked to the email address [eliteivy74@gmail.com](mailto:eliteivy74@gmail.com) (the “Gmail Account”).<sup>3</sup> At times,

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<sup>1</sup> Law enforcement has identified BIANCOFIORI as the user of the Biancofiiori Facebook Account in several ways. First, the Biancofiiori Facebook Account user name, “Ben Beanz Biancofiiori,” is consistent with BIANCOFIORI’s true name. Moreover, according to Victim A and Victim B, BIANCOFIORI is often referred to, and refers to himself, by the nickname “Beanz.” Additionally, as discussed below (*see* paragraph 33), Victim C provided law enforcement with copies of messages that she exchanged with BIANCOFIORI on or about November 10, 2015, using Facebook’s messaging service. In those messages, BIANCOFIORI used the Biancofiiori Facebook Account and told Victim C that “[t]hey call me Beanz.” Victim A also identified the Biancofiiori Facebook Account as being an account she knows to be used by BIANCOFIORI. In addition, beginning no later than February 2016 and continuing to approximately early April 2016, the Biancofiiori Facebook Account could be viewed in its entirety by any member of the public who maintains a Facebook account, including law enforcement. I have reviewed a number of photographs posted on the Biancofiiori Facebook Account and, having previously reviewed a known photograph of BIANCOFIORI, recognize him in the numerous photographs which appear to be posted by the user of the account.

<sup>2</sup> On or about February 18, 2016, pursuant to 18 U.S.C. § 2703(f), the FBI requested the preservation for a period of 90 days of all stored communications, records, and other evidence in Facebook’s possession regarding the Biancofiiori Facebook Account. Since the date of the preservation letter, BIANCOFIORI has deleted certain Facebook posts from public view, and also, on or about early April 2016, made portion of his Facebook account private.

<sup>3</sup> BIANCOFIORI is believed to be a user of the Gmail Account, which according to Google was created on or about May 14, 2015. First, as described below (*see* paragraph 25), BIANCOFIORI told Victim B that he needed to be the one to post the commercial sex advertisements on Backpage.com, and according to both Victim B and Victim C, BIANCOFIORI posted photographs of both women on Backpage.com in advertisements for commercial sex. Documents provided by Backpage.com confirm that such postings were made (*see, e.g.,* paragraph 26, below), often from Naperville, Illinois, where

BIANCOFIORI rented and caused to be rented hotel rooms where the women engaged in commercial sex acts on his behalf; later, BIANCOFIORI and others, sometimes including three adult males, Individual A, Individual B, and Individual C, drove the women to locations where they engaged in commercial sex acts with customers. BIANCOFIORI then kept the vast majority of the proceeds earned by the women.

7. As explained below, the investigation has further revealed that, beginning no later than January 2016 and continuing until approximately March 2016, BIANCOFIORI ran his sex-trafficking business primarily out of a townhouse located at 1913 Golden Gate, Naperville, Illinois (the “**Subject Premises**”). At the **Subject Premises**, which also served as BIANCOFIORI’s residence, BIANCOFIORI posted online commercial sex advertisements, stored items related to his sex-trafficking business, including vehicles and drugs, obtained and stored proceeds earned from his victims’ commercial sex acts, and physically abused the women who engaged in commercial sex acts on his behalf.

8. Further, during the course of the investigation, the FBI conducted separate interviews of several women who engaged in commercial sex acts for BIANCOFIORI between approximately 2007 and March 2016, including Victim A, Victim B, and Victim C. As described in more detail below, BIANCOFIORI

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BIANCOFIORI’s residence (the **Subject Premises**) is located. Also, records provided by Google reflect that the subscriber name tied to the Gmail Account is “Ivy Soprano.” Based upon my training and experience, and the investigation to date, I believe that “Ivy Soprano” is a false name used by BIANCOFIORI and his associates to conceal the true identity of the user of the Gmail Account in an effort to evade law enforcement.



physically abused and caused others to physically abuse Victim A, Victim B, Victim C, Victim D, Victim E, and other women known and unknown, all of whom engaged in commercial sex acts on behalf of BIANCOFIORI, including by punching and beating the women. BIANCOFIORI sometimes beat the women with such force that he caused lacerations, bruising, swelling, blood loss, and injuries that necessitated medical attention. At times, BIANCOFIORI used plastic-adorned fingerless boxing gloves to beat one woman, Victim D.

9. As explained below, in approximately April 2016, BIANCOFIORI learned of the federal grand jury investigation inquiring into allegations that BIANCOFIORI engaged in sex trafficking through the use of force, fraud, and coercion. The investigation has further shown, in part through social media postings BIANCOFIORI has made using the Biancofiori Facebook Account and BIANCOFIORI's Instagram account (the "Biancofiori Instagram Account"),<sup>4 5</sup> that

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<sup>4</sup> Law enforcement has identified BIANCOFIORI as the user of the Biancofiori Instagram Account in the following ways. First, the Biancofiori Instagram Account has used two user names, "ILLSTATESFINEST74" (including on April 5, 2016) and "CADILLACPIMPIN74" (including on March 28, 2016) and is linked to the name, "Ben Biancofiori." The user names "ILLSTATESFINEST74" and "CADILLACPIMPIN74" are consistent with identifiers used by BIANCOFIORI on another occasion, namely by including "ILLSTATES FINEST" and the number "74." BIANCOFIORI has incorporated the number 74 into the Gmail Account (eliteivy74@gmail.com), and numerous posts on the Biancofiori Facebook Account contain a hashtag followed by the words "illstatesfinest." For example, the following posting was placed on the Biancofiori Facebook Account on April 8, 2016, which law enforcement believes was directed at personnel assigned to the instant investigation:

since approximately mid-March 2016, BIANCOFIORI has been traveling in the western United States, at times with Victim D and Victim E. The investigation has further shown that BIANCOFIORI posted Victim E in online commercial sex advertisements using Backpage.com and the Gmail Account since mid-March 2016 in Phoenix, Arizona, and Denver, Colorado.

**BIANCOFIORI'S USE OF FORCE, FRAUD, AND COERCION  
AGAINST FIVE VICTIMS WHO ENGAGED  
IN COMMERCIAL SEX ACTS ON HIS BEHALF**

10. During the course of the investigation, Victim A, Victim B, and Victim C provided the following information about themselves and other women, including Victim D and Victim E, all of whom were subjected to force, fraud, and coercion by



**Ben Beanz Biancofiori** 😊 feeling determined.

2 hrs · 🌐

Just thought I would start my day off by telling the ppl who have to be beyond frustrated with me by now... I hope your weekend is half as good as my week has been 😊. Nothing is free, Im going to make u earn your little paychecks. 🤖 🚗 🚗 🚗 🚗 🚗 🚗 🚗 🚗 #illstatesfinest #gleamteamgeneral #chessnotcheckers

Also, the Biancofiori Facebook Account appears to be linked to the Biancofiori Instagram Account, as there are times that a post appears on the Biancofiori Facebook Account with a reference to Instagram written next to the date of the post. In addition, beginning no later than approximately February 2016 and continuing to approximately early April 2016, the Biancofiori Instagram Account could be viewed by any member of the public, including law enforcement. Consequently, I and other law enforcement officers have reviewed a number of publicly available photographs posted on the Biancofiori Instagram Account and, having previously reviewed a known photograph of BIANCOFIORI, recognized him in numerous photographs that appear to be posted by the user of the account.

<sup>5</sup> On or about February 18, 2016, pursuant to 18 U.S.C. § 2703(f), the FBI requested the preservation for a period of 90 days of all stored communications, records, and other evidence in Instagram's possession regarding the Biancofiori Instagram Account. Since the date of the preservation letter, BIANCOFIORI has deleted certain Instagram posts from view, and also, in early April 2016, made his Instagram account private.



BIANCOFIORI and others who financially benefitted from commercial sex acts engaged in by the victims.

**A. Victim A<sup>6</sup>**

11. According to Victim A, who was born in 1986, she engaged in commercial sex acts on behalf of BIANCOFIORI from approximately 2007 until 2012.<sup>7</sup> During that time, BIANCOFIORI subjected Victim A to force, fraud, and coercion in order to cause Victim A to engage in commercial sex acts, from which BIANCOFIORI financially benefitted.

12. More specifically, according to Victim A, Victim A and BIANCOFIORI began a romantic relationship in 2005, which continued on and off until approximately early 2016. In approximately 2007, an unidentified male proposed to Victim A that she engage in sexual activity with him in exchange for money. Victim A agreed to the proposal, and informed BIANCOFIORI of the proposal. BIANCOFIORI agreed to go with Victim A to the meeting in exchange for half of

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<sup>6</sup> Based on a review of law enforcement databases, Victim A has approximately nine convictions and 17 arrests, including convictions for the following offenses: battery, prostitution, attempting to obstruct justice, possession of cannabis, possession of drug paraphernalia, theft, and driving under the influence of alcohol. Victim A recently has been arrested and charged with a violent offense, and is cooperating in part with the hope that she will receive consideration in connection with her pending charges. In addition, according to Victim A, during her relationship with BIANCOFIORI, Victim A has at times reported false information to law enforcement regarding BIANCOFIORI. For example, Victim A filed a false police report at BIANCOFIORI's direction in order to conceal the fact that BIANCOFIORI battered Victim A and directed her kidnapping. In addition, Victim A also reported that during the course of her relationship with BIANCOFIORI, Victim A lied to a healthcare provider at a medical facility in order to conceal the fact that BIANCOFIORI was the source of her injuries. Information provided by Victim A regarding BIANCOFIORI has been corroborated by other sources, including other witness testimony and documentary evidence.

<sup>7</sup> During the course of the investigation, law enforcement showed Victim A a known photograph of BIANCOFIORI, which Victim A identified as BIANCOFIORI.



the money earned by Victim A. Victim A engaged in a commercial sex act and split the proceeds earned with BIANCOFIORI.

13. According to Victim A, a short time later, BIANCOFIORI began pressuring Victim A to engage in commercial sex acts for money. BIANCOFIORI told Victim A that they would be a "team" and "partners," and that he would post pictures of Victim A in online advertisements. Eventually, Victim A agreed to BIANCOFIORI's proposal. BIANCOFIORI and another individual took photographs of Victim A, and used the photos in online advertisements on Craigslist.com.

14. Victim A observed BIANCOFIORI place the advertisements online while they were in hotel rooms in the western suburbs of Chicago, including the Hyatt, Comfort Inn, and Extended Stay in Lisle, Illinois, and Downers Grove, Illinois. After the advertisements were posted, customers responded to the ads, and the customers came to the hotel rooms to engage in sex acts with Victim A in exchange for money. While Victim A engaged in commercial sex acts, BIANCOFIORI waited in a vehicle or in an adjoining hotel room. In her first month of working with BIANCOFIORI in the commercial sex business, Victim A engaged in commercial sex acts almost every day and made approximately \$40,000, which Victim A split with BIANCOFIORI.

15. According to Victim A, after a few weeks or months, Victim A told BIANCOFIORI that she no longer wanted to engage in commercial sex acts. BIANCOFIORI pressured Victim A to continue. BIANCOFIORI became physically aggressive toward Victim A, tried to stop her from leaving him, and threatened her

and her family. For example, on one occasion, as Victim A attempted to return to a hotel room to collect her belongings and leave BIANCOFIORI, BIANCOFIORI followed Victim A to the hotel, and approached her from behind and punched her, which caused the front of Victim A's head to hit the hotel room door. BIANCOFIORI and Victim A then entered the hotel room, and Victim A felt that she could not leave the room without BIANCOFIORI physically harming her.

16. Victim A stated that BIANCOFIORI continued to hit or beat Victim A at least once a week on average, but there were times when BIANCOFIORI beat Victim A for several days straight. BIANCOFIORI beat Victim A with objects and with his hands, causing Victim A's body to bruise and swell. At times BIANCOFIORI withheld food or sleep from Victim A. BIANCOFIORI caused injuries to Victim A such that she sought medical attention at hospitals within the Chicagoland area. According to Victim A, because of BIANCOFIORI's persistence, threats, and physical beatings, Victim A did not believe she could leave and stop engaging in commercial sex acts on behalf of BIANCOFIORI.

17. According to Victim A, beginning in approximately 2007, another woman began working for BIANCOFIORI by engaging in commercial sex acts, and additional women began working for him beginning in approximately 2008. Victim A stated that as a result, Victim A spent less time engaging in commercial sex acts for BIANCOFIORI, and instead took calls from customers, scheduled appointments, and along with BIANCOFIORI, drove the women to appointments. According to Victim A, while the women engaged in commercial sex acts for BIANCOFIORI, he



had them work almost every night, though women came and went. To Victim A's knowledge, BIANCOFIORI did not pay these women, but he fed them at times, gave them small amounts of money for essential items, and provided them with drugs, including heroin.

18. Victim A saw BIANCOFIORI beat the women who engaged in commercial sex acts on his behalf, and also had others beat the women. Victim A stated that on a couple of occasions, BIANCOFIORI ordered Victim A to hit the women, and Victim A did so because she was afraid that if she refused to follow BIANCOFIORI's order, he would instead beat Victim A. Victim A stated that BIANCOFIORI beat two women who worked for him even after he instructed Victim A to beat the women. According to Victim A, after the beatings, the women continued to engage in commercial sex acts on behalf of BIANCOFIORI.

19. Victim A stated that other individuals assisted BIANCOFIORI with his business at times, including Individual B.<sup>8</sup> According to Victim A, Individual B "babysat" some of the women while they worked, including by staying with the women at hotels. Victim A also stated that Individual B at times drove the women to their appointments with customers.

20. According to Victim A, she tried to leave BIANCOFIORI multiple times without success. On one occasion, Victim A ran away to a shelter. According to Victim A, after BIANCOFIORI convinced Victim A to return to him, BIANCOFIORI beat Victim A and it took four weeks for Victim A's body to heal. On

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<sup>8</sup> During the course of the investigation, Victim A was shown a known photograph of Individual B, and she identified Individual B by name.

another occasion, Victim A ran away from BIANCOFIORI; according to Victim A, BIANCOFIORI learned of Victim A's whereabouts and arranged for two of his associates, Individual D and Individual E, to kidnap Victim A at gunpoint and return Victim A to BIANCOFIORI.<sup>9</sup> According to Victim A, Individual D and Individual E<sup>10</sup> put Victim A in a vehicle in order to return her to BIANCOFIORI.

21. Following Victim A's unsuccessful attempts to leave BIANCOFIORI, Victim A at times engaged in commercial sex acts on behalf of BIANCOFIORI, primarily when BIANCOFIORI and Victim A traveled out of state. Victim A stated that in approximately 2010, BIANCOFIORI posted Victim A in online classified advertisements for commercial sex while they traveled to Atlanta, Georgia, Tampa, Florida, and he did so again in approximately 2012, when they traveled to Atlantic City, New Jersey. In approximately August 2012, Victim A stopped working for BIANCOFIORI and moved to another state.

22. According to Victim A, since ceasing to work for BIANCOFIORI in 2012, Victim A has at times lived with BIANCOFIORI and maintained a romantic relationship, and has continued to communicate with BIANCOFIORI. Through those communications with BIANCOFIORI and with others, Victim A learned of other women, including Victim D, associated with BIANCOFIORI's sex trafficking business.

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<sup>9</sup> According to Victim B, BIANCOFIORI has previously admitted to Victim B that he arranged the kidnapping of another woman with the same first name as Victim A. See paragraph 30, below.

<sup>10</sup> During the course of the investigation, Victim A identified Individual D and Individual E as adult males and by name.



**B. Victim B<sup>11</sup>**

23. According to Victim B, who was born in 1993, she engaged in commercial sex acts on behalf of BIANCOFIORI from approximately January 2016 until March 2016.<sup>12</sup> During that time, BIANCOFIORI subjected Victim B to force, fraud, and coercion in order to cause Victim B to engage in commercial sex acts from which BIANCOFIORI and others financially benefitted.

24. More specifically, Victim B stated that she first met BIANCOFIORI in approximately December 2015 at the **Subject Premises** through her friend, Victim E, who at the time engaged in commercial sex acts on behalf of BIANCOFIORI.<sup>13</sup> BIANCOFIORI told Victim B that he was a pimp, that he wanted Victim B to work for him, and that she would be paid approximately 40% of the revenue she brought in, with the rest of the money to be divided between him and his “team,” which BIANCOFIORI explained included others who helped him with his sex trafficking business. Based on this information from BIANCOFIORI, Victim B agreed to engage in commercial sex acts on behalf of BIANCOFIORI and began working for BIANCOFIORI the following day.

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<sup>11</sup> Based on a review of the law enforcement databases, Victim B has no arrests and no convictions. The information provided by Victim B during the course of this investigation has been corroborated by other evidence, including other witnesses and documentary evidence.

<sup>12</sup> During the course of the investigation, law enforcement showed Victim B a known photograph of BIANCOFIORI, which Victim B identified as BIANCOFIORI.

<sup>13</sup> More information about Victim E is contained in paragraphs 44-47, below. Victim E has not yet been interviewed.

25. According to Victim B, when she arrived at the **Subject Premises** the following day, Victim D and Victim E were present and took pictures of Victim B.<sup>14</sup> BIANCOFIORI then posted the photographs in online advertisements on Backpage.com.<sup>15</sup> BIANCOFIORI told Victim B that he needed to be the one to post the photos because he was the only one who knew how to do it the correct way. Victim B was advertised under the working name, "Tiffany."

26. During the course of this investigation, Backpage.com provided copies of advertisements associated with the email address "eliteivy74@gmail.com" (the "Gmail account") for the period of time between on or about October 23, 2015, and May 6, 2016. These advertisements were posted in multiple cities' "adult entertainment, escort" section, each linked to the Gmail account. I have reviewed these advertisements, and saw that between on or about January 7, 2016, and on or about March 13, 2016, Victim B's semi-nude photograph appeared in online commercial sex advertisements for the Chicagoland area, each time advertising her services with the name "Tiffany."

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<sup>14</sup> During the course of the investigation, Victim B has reviewed known photographs of Victim D, Victim E, Individual A, Individual B, and Individual C and identified them by their names. Victim B identified Individual A, Individual B, and Individual C as the people who at times drove her to appointments.

<sup>15</sup> Based on my training and experience, I understand that Backpage.com is a website that allows users to post advertisements for goods and services, including adult escort services. An individual who wants to post an ad on Backpage.com may set up an account with Backpage.com, and the individual must provide Backpage.com with an email address and password. Once an account is set up, a user can place ads for services. A representative from Backpage.com has confirmed that Backpage.com does not have any facilities, services, or offices in the State of Illinois. Also, according to Backpage.com, the volume of advertisements described in this Affidavit does not include the re-posting of an advertisement. Based upon the records provided by Backpage.com, Backpage.com advertisements posted using the Gmail Account have been re-posted on multiple occasions.



27. Victim B said that after the online advertisements were placed on Backpage.com, clients made appointments by calling the phone number posted in the advertisement. Victim B stated that Victim D took the client calls and scheduled the appointments.

28. According to Victim B, in the beginning, she was driven to appointments by Individual A or Individual B, both of whom knew that Victim B's appointments were for commercial sex acts and who received a portion of the proceeds Victim B earned from engaging in commercial sex acts. At other times, Victim E or Individual C, another associate of BIANCOFIORI, drove her to appointments, or Victim B drove herself. Victim B's commercial sex appointments were for "outcalls" only, meaning that the appointments occurred at a location of the customer's choosing.

29. According to Victim B, BIANCOFIORI required Victim B to be at the **Subject Premises**, ready to engage in commercial sex acts, by 7 p.m. every evening. Victim B stated that, on average, she made approximately \$1500-\$2000 a day by engaging in commercial sex acts, and on a slow day she made no less than \$550. On a slow day, she performed two outcalls. When she arrived at an outcall, Victim B obtained the money from the customer first, and then texted Victim D, "AG," meaning "all good." After the appointments, according to Victim B, all of the

money earned was provided to BIANCOFIORI, who controlled the money and on occasion provided Victim B with limited spending money.<sup>16</sup>

30. Victim B stated that, while working for BIANCOFIORI, Victim B was afraid to leave BIANCOFIORI, even though BIANCOFIORI told Victim B that she could leave. According to Victim B, BIANCOFIORI told her about what happened to other women who tried to leave, including one woman who attempted to leave BIANCOFIORI several times. Victim B stated that BIANCOFIORI told Victim B that he sent people to kidnap the woman, who he identified to Victim B only by first name, and put her in the trunk of a car.<sup>17</sup>

31. According to Victim B, BIANCOFIORI intimidated her by physically beating other women in her presence, including Victim C, Victim D, and Victim E (see e.g., paragraphs 38, 43, and 46-47, below). On one occasion, BIANCOFIORI ordered Victim D and Victim E to beat up Victim B at the **Subject Premises**. Victims D and E complied with the order. Shortly thereafter, BIANCOFIORI beat

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<sup>16</sup> Other evidence obtained during the course of the investigation is consistent with Victim B's statement that BIANCOFIORI kept the majority of the money earned by Victim B and other women engaged in commercial sex. For example, on or about March 28, 2016, a 14-second video was posted to the Biancofiiori Instagram Account and the Biancofiiori Facebook Account. The video depicts a person dropping numerous \$100 bills on the floor while rap music plays in the background. Based upon the investigation to date, including information obtained from documents reflecting that BIANCOFIORI has no known legitimate source of income, I believe that the money found in the video constitutes proceeds of BIANCOFIORI's illegal activities.

<sup>17</sup> The first name BIANCOFIORI told Victim B is also the same first name of Victim A, who has told law enforcement that BIANCOFIORI had two associates kidnap her and return her to BIANCOFIORI (see paragraph 20, above). Based upon this information and information provided by Victim A, I believe that the person BIANCOFIORI admitted to Victim B to kidnapping was Victim A.



Victim D. In approximately March 2016, Victim B ran away from BIANCOFIORI and not worked for him since.

**C. Victim C<sup>18</sup>**

32. According to Victim B and Victim C, Victim C, born in 1997, engaged in commercial sex acts on behalf of BIANCOFIORI in or about February 2016.<sup>19</sup> During that time, BIANCOFIORI subjected Victim C to force, fraud, and coercion in order to cause Victim C to engage in commercial sex acts from which BIANCOFIORI financially benefitted.

33. More specifically, Victim C stated that she met BIANCOFIORI through Facebook in the fall of 2015 through a mutual friend. According to Victim C, BIANCOFIORI began sending Victim C messages through Facebook and proposed that Victim C work for BIANCOFIORI's commercial sex business. Later, Victim C provided law enforcement with screenshots of messages that she

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<sup>18</sup> Based on a review of the law enforcement databases, Victim C has five arrests and no convictions. Victim C has recently been charged with possessing drugs and is cooperating with law enforcement in part with the hope that she will receive consideration in connection with that pending charge. Victim C has previously provided reliable information to law enforcement in connection with another sex trafficking investigation, and the information provided by Victim C in this investigation has been corroborated by other sources, including other witnesses, audio recordings, and documentary evidence.

<sup>19</sup> During the course of the investigation, Victim C showed law enforcement a photograph of BIANCOFIORI, which Victim C identified as BIANCOFIORI. Further, Victim B was previously shown a known photograph of Victim C and identified her by a variation of her first name, as a woman who engaged in commercial sex acts on behalf of BIANCOFIORI, and as a victim of physical abuse by BIANCOFIORI. Victim C has also reviewed known photographs of Victim B, Victim D, and Victim E, and identified them by first, and sometimes last, name, and as individuals who engaged in commercial sex acts on behalf of BIANCOFIORI.

exchanged with BIANCOFIORI, which contained the following Facebook message posted using the Biancofiori Facebook Account:

Hey Beautiful . . . my lil bro knows u, tat man. He told me ur 1000. We should talk ppr sometime. Make ur next move ur best move.

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Just getting up. Text me 847-284-XXXX [Biancofiori Phone 1]. They call me Beanz. I own the escort service bro mentioned to u.<sup>20</sup>

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<sup>20</sup> Based on the investigation to date, I believe that BIANCOFIORI uses the term "Gleam Team" to describe the women that engage in commercial sex acts for his financial benefit and associates of BIANCOFIORI who further his illegal business, and that he uses the term "Gleam Team General" to refer to himself. More specifically, and for example, during the investigation, Victim C identified a February 10, 2016, photograph of Biancofiori, Victim C, Victim D, Victim E, and another woman, which was posted on the Biancofiori Facebook Account with the title, "Gleam Team." Also, on or about February 28, 2016, a photograph of Biancofiori, Victim B, Victim D, Victim E, and two other individuals was posted on the Biancofiori Facebook Account with the hashtag, among others, of "#gleamteam." Further, the Biancofiori Facebook account "tags," or links, to what appear to be the Facebook accounts of Victim D and Victim E. Further, Victim B reviewed the February 28, 2016 photograph and identified herself and the other persons in the photograph, including BIANCOFIORI, Victim D, and Victim E. In addition, on or about May 4, 2016, BIANCOFIORI posted the following photograph on the Biancofiori Facebook Account, which based on the investigation to date, law enforcement believes was directed at personnel assigned to the instant investigation:



BIANCOFIORI also told Victim C that if she worked for him, Victim C would be his “top girl,” a money maker, and would make “a stack or two” a night, which Victim C understood to mean that she would make \$1000 to \$2000 per night. Victim C did not agree to work for BIANCOFIORI at that time.

34. In approximately February 2016, Victim C attended a party at a townhouse in Naperville, Illinois, which she understood to be BIANCOFIORI’s residence,<sup>21</sup> where she met Victim B, Victim D, and Victim E. BIANCOFIORI told Victim C that if she worked for him, she could take over for Victim D and be his “main girl.”

35. Victim C stated that shortly after the party, she began working for BIANCOFIORI. Prior to engaging in commercial sex acts on behalf of BIANCOFIORI, Victim D took photographs of Victim C at the **Subject Premises**, which BIANCOFIORI edited, and Victim C also provided Instagram photos from



<sup>21</sup> Victim C has since reviewed a known photograph of the **Subject Premises** and identified it being BIANCOFIORI’s residence.

her own account to BIANCOFIORI. Then, shortly after the photos were taken, BIANCOFIORI told Victim C, in front of Victim B and Victim E, that he was posting all three women on Backpage.com. Victim C said that BIANCOFIORI advertised Victim C under the name, "Aisha."

36. I have reviewed the advertisements that were provided by Backpage.com, and these records confirm that on or about February 15, 2016, Victim B, Victim C, and Victim E's semi-nude and suggestive photographs appeared in an online commercial sex advertisement in the Chicago area. These records further confirm that Victim B, Victim C, and Victim E were all posted together in the commercial sex advertisement, and that Victim C was advertise under the name "Aisha." During the investigation, Victim C reviewed a copy of this Backpage.com advertisement, and told law enforcement that BIANCOFIORI posted the advertisement.

37. On that first night of engaging in sex for money, Victim C said she texted Victim D or Victim E "all good" during the appointment, which meant that the appointment was going as planned. According to Victim C, she made about \$600 in approximately three hours during her first night of engaging in commercial sex acts on behalf of BIANCOFIORI. According to Victim C, Victim B and Victim E drove her to the appointments, including an appointment with one client at the Red Roof Inn in DuPage County, Illinois, collected the money she made following the appointments, and then handed over the money to BIANCOFIORI when they returned to the **Subject Premises**. According to Victim C, BIANCOFIORI told

Victim C that she could not get any of the money she earned until BIANCOFIORI knew that she was “official” and “in it.”

38. A few days later, BIANCOFIORI picked up Victim C in a silver Cadillac and drove to the **Subject Premises**.<sup>22</sup> According to Victim C, while there, BIANCOFIORI told Victim C that she was lucky he did not slap her. After Victim C challenged BIANCOFIORI's statement, BIANCOFIORI, with a watch on, slapped Victim C across the face a couple of times in the presence of Victim B, Victim D, and Victim E.<sup>23</sup> BIANCOFIORI's slaps caused a bump on Victim C's head, facial tenderness, and bleeding gums. According to Victim C, after BIANCOFIORI hit her, Victim D told Victim C that Victim C took the beating better than Victim E did on a prior occasion.

39. According to Victim C, later that night, Victim C was posted in an advertisement on Backpage.com for sexual services. According to Victim C, after the advertisement was posted, clients called requesting Victim C's services. Victim C did not want to engage in commercial sex acts that night, but did so because BIANCOFIORI told her she had to and because she had no transportation, as BIANCOFIORI picked her up earlier that day. According to Victim C, she kept

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<sup>22</sup> Other evidence obtained during the course of the investigation corroborates that BIANCOFIORI was associated with a silver Cadillac. More specifically, on or about February 27, 2016, a photograph of the front of a silver XTS Cadillac and five shopping bags filled with what appears to be shoe boxes. In addition, the following text was posted:

Lavish Habits. #cadillac #xtsptatinum #airjordan #23 #chicago  
#illstatesfinest #selfmade #selfpaid #lavishhabits  
#doinshituaint

<sup>23</sup> In a separate statement to law enforcement, Victim B recounted this same physical abuse of Victim C by BIANCOFIORI.



approximately \$200 of the proceeds she made that evening and did not immediately inform BIANCOFIORI that she was keeping the money. Following the appointments, Victim C returned to the **Subject Premises**; Victim C left that next morning and stopped engaging in commercial sex acts for BIANCOFIORI.

40. Later, at law enforcement's direction, Victim C consensually recorded telephone conversations with BIANCOFIORI, who was using telephone number 847-284-XXX ("Biancofiiori Phone 1").<sup>24</sup> During the calls, BIANCOFIORI threatened Victim C in part because she purportedly stole \$200 from him:

a. On or about February 15, 2016, at approximately 1:47 a.m. CST, Victim C had a text message conversation with BIANCOFIORI, who was using Biancofiiori Phone 1. During the conversation, BIANCOFIORI stated, "I promise u dead hoe. Stealing and snitchin means off with ur head. Guaranteed." Later, BIANCOFIORI stated, "Might spare u and just have fam splash acid in ur face. See how far u go then in life. More than one way to kill u b\*\*\*h."

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<sup>24</sup> Law enforcement believes that BIANCOFIORI is the user of Biancofiiori Phone 1 for the following reasons: (1) between approximately May 15, 2015, and at least March 18, 2016, the subscriber information for Biancofiiori Phone 1 lists the subscriber name and address as Benjamin Biancofiiori, 1913 Golden Gate Lane, Naperville, Illinois, 60563-1457 (i.e., the **Subject Premises**); (2) according to screenshots of Facebook messages Victim C received from the Biancofiiori Facebook Account on or about November 10, 2015, BIANCOFIORI provided Victim C with the telephone number for Biancofiiori Phone 1 (see paragraph 33, above); (3) according to Victim C, she recognized the male voice heard during these conversations as being that of BIANCOFIORI; and (4) a law enforcement officer familiar with BIANCOFIORI's voice based upon an approximately 50 minute telephone conversation on March 22, 2016, with an individual purporting to be BIANCOFIORI, who was using Biancofiiori Phone 1, has reviewed the recordings described above and identified the voice on the recordings as being the same voice as the person with whom he spoke on March 22, 2016, i.e., BIANCOFIORI.

b. On or about February 16, 2016, at approximately 1:52 p.m. CST, Victim C had a consensually recorded telephone conversation with BIANCOFIORI, who was using Biancofiori Phone 1. During the call, BIANCOFIORI accused Victim C of stealing from him, and threatened violence against her. More specifically, BIANCOFIORI said, "You stole from me b\*\*ch, and threatened to snitch on me."<sup>25</sup> Later, he said, "I'm gonna show you what real killers do."

c. On or about February 16, 2016, at approximately 1:54 p.m. CST, Victim C had a consensually recorded telephone conversation with BIANCOFIORI, who was using Biancofiori Phone 1. During the call, Victim C said, "I worked for you, gave you whatever the f\*\*k you wanted. You made a whole stack [\$1000] off my a\*\*." In response, BIANCOFIORI did not deny Victim C working for him, and instead replied, "B\*\*\*h, a stack? I spent that on t-shirts yesterday at Macy's."<sup>26</sup> During their conversation, BIANCOFIORI continued to threaten Victim C, stating,

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<sup>25</sup> In this Affidavit, I describe various conversations that were consensually recorded or obtained. These descriptions often include my and other agents' understanding of what is being said during such conversations set forth parenthetically. This understanding and interpretation of the conversations is based on (i) the content and context of the conversations, (ii) my and other agents' experiences as law enforcement officers, including our experience observing written conversations as a whole, and (iii) the investigation to date. The summaries of the intercepted conversations set forth in this Application are based on my review of the audio recordings of the conversations and are draft – not final – transcriptions of the conversations. Finally, the summaries contained herein do not include all potentially criminal communications obtained, or all statements or topics covered during the course of the consensually recorded conversations or consensually obtained text message exchanges.

<sup>26</sup> On or about February 15, 2016, using the Biancofiori Facebook Account, BIANCOFIORI posted the message, "Bout to go Armani crazy." The posting also provided location information, which reflected that BIANCOFIORI was located at Macy's department store in Oak Brook, Illinois.



“When my n\*\*\*\*s are burning y’all with hot hangers, and y’all are crying asking for mercy, know I did that s\*\*t, b\*\*\*h.”

d. On or about February 16, 2016, at approximately 1:59 p.m. CST, Victim C had a consensually recorded telephone conversation with BIANCOFIORI, who was using Biancofiori Phone 1. At the beginning of this call, Victim D<sup>27</sup> answered the phone, but BIANCOFIORI ended up talking with Victim C for the remainder of the call. During this conversation, BIANCOFIORI continued to threaten Victim C, stating, “My n\*\*\*\* and his goonies are going to put y’all in the trunk and bring you to me, and I’m going to figure out what to do with y’all.” The call ended when BIANCOFIORI stated, “Enjoy what the f\*\*\* you’ve got left, b\*\*\*\*, which is nothing really.”

e. On or about February 16, 2016, at approximately 2:52 p.m. CST, Victim C had a consensually recorded telephone conversation with BIANCOFIORI, who was using Biancofiori Phone 1. During the conversation, BIANCOFIORI acknowledged that Victim C kept some of her the proceeds she earned by engaging in commercial sex acts and continued to threaten Victim C. More specifically, BIANCOFIORI stated, “You might’ve slicked me over a couple dollars, which is nothing. That s\*\*t is called shrinkage in the business, ok. Everybody steals in every business. That s\*\*\* is shrinkage, it’s expected. Especially in some s\*\*\* you dealing with nothing a\*\* b\*\*\*\*\*s, you dig. So don’t think you slicked me out of s\*\*\*. Like, it’s part of the game.” Later, Victim C questioned BIANCOFIORI, stating, “I stole

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<sup>27</sup> According to Victim C, Victim C recognized the voice of the female heard on this call as Victim D.



from you what's mine?" Victim C also said, "You can't take what's never yours." In response, BIANCOFIORI said, "It wasn't never mine? You were only steered there . . . [.]” BIANCOFIORI further stated, "I love motherf\*\*\*ing triggers," and later he said, "I'll take your mother\*\*\*ing life, ho."

**D. Victim D**

41. Victim D, born in 1995, has not yet been interviewed by law enforcement officers with regard to this investigation. However, Victim A, Victim B, and Victim C have separately identified Victim D by her real name, photograph, and by the nickname used by Victim D, "Hailey." According to Victim A, Victim D worked for BIANCOFIORI sometime in 2015, but Victim A learned about Victim D through photographs that BIANCOFIORI sent Victim A and through conversations she had with Victim D. Victim B and Victim C stated separately that Victim D worked for BIANCOFIORI as his "main" female, and that Victim D lived with BIANCOFIORI at the **Subject Premises**.

42. Documents received from Backpage.com during the course of the investigation reflect that Victim D was posted in online commercial sex advertisements in 2015. These advertisements were posted in multiple cities' "adult entertainment, escort" section of Backpage, com, with the user address identified as the Gmail account, including but not limited to the following advertisements:

a. On or about October 23, 2015, Victim D's semi-nude and suggestive photographs appeared in online commercial sex advertisements for the Chicago area.

b. Between on or about October 26, 2015, and October 30, 2015, Victim D's semi-nude and suggestive photographs appeared in online commercial sex advertisements for the Denver, Colorado, area.

c. Between on or about November 2, 2015, and November 10, 2015, Victim D's semi-nude and suggestive photographs appeared in online commercial sex advertisements for the Colorado Springs, Colorado, area.

d. Between on or about November 12, 2015, and November 30, 2015, Victim D's semi-nude and suggestive photographs appeared in online commercial sex advertisements for the Chicago area.

42. According to separate statements by Victim B and Victim C, while they worked for BIANCOFIORI from January to March 2016, Victim D took client calls and made appointments for the other women to meet with clients and engage in sex acts for money; according to Victim B, during the time she worked for BIANCOFIORI, Victim D no longer engaged in commercial sex acts on behalf of BIANCOFIORI. Victim B stated that BIANCOFIORI told her that Victim D had been "ran through" too many times, meaning that she had previously engaged in commercial sex acts on too many occasions to be good for the business any longer. In addition to receiving client calls and setting up appointments, according to separate statements by Victim A, Victim B, and Victim C, Victim D took photographs of the women who engaged in commercial sex acts for BIANCOFIORI so that BIANCOFIORI could post the photos in online advertisements. Victim B and Victim C also separately stated that they communicated with Victim D during and after

appointments. For example, according to Victim B, she texted Victim D "AG," meaning all good, when Victim B received money from the customer, as well as the amount of money received.<sup>28</sup> Similarly, according to Victim C, she at times texted "all good" to Victim D<sup>29</sup> when out on appointments with customers.

43. According to Victim B, she observed BIANCOFIORI beat Victim D numerous times. Victim B stated that BIANCOFIORI beat Victim D approximately 6-7 times per month, and would sometimes beat Victim D severely for a few days in a row, making her face and body bruised and swollen. According to Victim B, BIANCOFIORI would then let Victim D's body heal for a while, and then beat her again. Victim B stated that after BIANCOFIORI beat Victim D, Victim D would not speak but would take calls from clients and arrange appointments. Victim B in part described the following with respect to BIANCOFIORI's physical abuse of Victim D:

a. On one occasion, BIANCOFIORI obtained a new ring that had "MOB" written on it in diamonds, which BIANCOFIORI said stood for "money over bitches."<sup>30</sup> According to Victim B, after BIANCOFIORI obtained the ring, he asked, "Who is the first one that wants to get this imprinted on their face?" A few days later, BIANCOFIORI punched Victim D in the forehead with the MOB ring.

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<sup>28</sup> Law enforcement has consensually review Victim B's telephone and observed text messages on Victim B's phone similar to those described by Victim B here.

<sup>29</sup> Victim C stated that when she texted Victim D, she used the telephone number 331-332-XXXX, which is the same telephone number listed on backpage.com advertisements featuring Victim C.

<sup>30</sup> On or about February 12, 2016, BIANCOFIORI posted on the Biancofiiori Facebook Account, "Should b done next week. Computer stages of my married to the game ring. 4 carat, VS Diamonds. #customonly #1of1 #mob." Then, on or about February 19, 2016, BIANOCFIORI posted on both the Biancofiiori Facebook Account and the Biancofiiori



b. According to Victim B, BIANCOFIORI sometimes beat Victim D using fingerless boxing gloves that had plastic knuckles, and he sometimes wore particular clothes—black baggy clothes and a hooded shirt with the hood up—when he beat Victim D. Victim B stated that during the beatings, Victim D's blood would gush, and BIANCOFIORI at times screamed at Victim D not to get blood on his floor. After one such beating, Victim B cleaned up a large pool of Victim D's blood that had accumulated on the bathroom floor of the **Subject Premises**.

c. Victim B stated that she cleaned Victim D's blood off the floor near the downstairs bathroom and kitchen in the **Subject Premises** on multiple occasions. According to Victim B, BIANCOFIORI kept a bottle of Clorox Bleach spray under the kitchen sink in the **Subject Premises** with a roll of paper towels next to it, and at some point Victim B was told by other women, including Victim D, to use the bleach spray to clean up the blood. Victim B also said that Victim D used the bleach spray on BIANCOFIORI's boxing gloves in order to remove any of her skin or blood from the gloves.

d. According to Victim B, at times when BIANCOFIORI's minor daughter was at the **Subject Premises**, BIANCOFIORI took Victim D into the

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Instagram Account, a photograph of a tattooed male hand wearing a ring with the letters "MOB" appearing to be spelled out in diamonds. Separately, Victim C told law enforcement that BIANCOFIORI showed Victim C a photograph of the "MOB" ring while they were at the **Subject Premises**, and that Victim C subsequently observed a photograph of the ring on Biancofiiori's Instagram Account. Victim C stated that she recognized the hand depicted in the photogram as BIANCOFIORI's hand because tattoos BIANCOFIORI has on his hands are found in the picture. Finally, on or about March 20, 2016, a photograph of BIANCOFIORI's tattooed hand wearing a diamond bracelet, the diamond "MOB" ring, and a belt bearing the Gucci-brand insignia, was posted on the Biancofiiori Facebook Account.

garage to beat her. On other occasions when BIANCOFIORI's minor daughter was at the **Subject Premises**, BIANCOFIORI drove with Victim D away from the residence and then beat her. According to Victim B, she observed Victim D shaking and upset immediately following these beatings.

e. According to Victim B, BIANCOFIORI treated Victim D like a prisoner. At times BIANCOFIORI required Victim D to shower with the bathroom door open, and he ordered others to watch Victim D when he left the house. BIANCOFIORI often told Victim D, in Victim B's presence, that he was not going to kill Victim D, but that he would give her "the treatment," which Victim B understood meant treating Victim D so badly that BIANCOFIORI would make Victim D want to kill herself. According to Victim B, she once asked BIANCOFIORI about obtaining pain medication for Victim D following a beating. BIANCOFIORI denied Victim B's request.

#### **E. Victim E**

44. Victim E, born in 1994, has not yet been interviewed by law enforcement officers with regard to this investigation. However, Victim B and Victim C have separately identified Victim E by her real name, photograph, and by her working name, "Brittany." According to Victim B and Victim C, Victim E engaged in commercial sex acts on behalf of BIANCOFIORI during the same time that both Victim B and Victim C engaged in sex for money on behalf of BIANCOFIORI. According to separate statements by Victim B and Victim C, Victim E went on outcalls to see clients after the appointments were arranged by Victim D.

Victim B and Victim C also separately stated that after the appointments, Victim E provided any money she earned by engaging in commercial sex acts to BIANCOFIORI.

45. I have reviewed the Backpage.com advertisements that were produced by Backpage.com and linked to the Gmail account, and also reviewed Backpage.com advertisements posted online within the past several days. Victim E appears in several online commercial sex advertisements, including, but not limited to, the following advertisements:

a. Between on or about December 1, 2015, and March 15, 2016, Victim E's semi-nude and suggestive photographs appeared in online commercial sex advertisements for the Chicago area.

b. On or about February 15, 2016, Victim B, Victim C, and Victim E's semi-nude and suggestive photographs appeared in an online commercial sex advertisement for the Chicago area.

c. On or about April 2, 2016, and April 6, 2016, Victim E's semi-nude and suggestive photographs appeared in online commercial sex advertisements for the Phoenix, Arizona, area.

d. Between on or about March 21, 2016, and May 6, 2016, Victim E's semi-nude and suggestive photographs appeared in online commercial sex advertisements for the Denver, Colorado, area.<sup>31</sup>

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<sup>31</sup> These online commercial sex advertisements in the Denver, Colorado area used the telephone number 720-361-XXXX.



46. According to Victim B, she observed BIANCOFIORI physically abuse Victim E. Victim B stated that on one occasion, BIANCOFIORI punched Victim E in her ear, which had been recently pierced. According to Victim B, Victim E's ear subsequently became infected. Also, Victim B saw BIANCOFIORI slap Victim E, purportedly because Victim E had been "mouthy."

47. According to Victim C, after BIANCOFIORI hit Victim C in the head and face, which was witnessed by Victim B, Victim D, and Victim E, Victim D told Victim C about a time that BIANCOFIORI hit Victim E. Victim D told Victim C that she took the beating better than Victim E took the beating. Victim D told Victim C that after BIANCOFIORI beat Victim E, Victim E cried in the corner.

#### **THE SUBJECT PREMISES**

48. As described above, according to information provided by Victim B and Victim C, beginning no later than January 2016 and continuing until at least approximately mid-March 2016, BIANCOFIORI and Victim D resided at the **Subject Premises**. In addition, Victim B and Victim C told law enforcement that Victim D and/or Victim E took photographs of each of them in early 2016 for posting on Backpage.com at the **Subject Premises**. Both Victim B and Victim C arrived at the **Subject Premises** in the evening prior to and following their engaging in sex in exchange for money. Finally, according to both Victim B and Victim C, BIANCOFIORI physically abused women at the **Subject Premises** in early 2016, including by beating Victim D so badly that she bled onto the floor of the **Subject Premises**.

49. In addition, according to Victim B, BIANCOFIORI had five cameras in and around the **Subject Premises**, including (1) one outside on the garage, (2) one on the front door, (3) one inside the house on the ledge of the sliding door, (4) one upstairs in the loft area, and (5) one on BIANCOFIORI'S closet door. Law enforcement has previously conducted surveillance in the area of the **Subject Premises** and observed a camera on the exterior of the **Subject Premises** on the front of the garage, as described by Victim B. In addition, Victim B also stated that BIANCOFIORI's closet door had a security code on it that only BIANCOFIORI and Victim D knew, and that BIANCOFIORI stored cash proceeds, drugs, jewelry and clothing in the closet. Finally, according to Victim B, BIANCOFIORI stored the boxing gloves that he used to beat Victim D on a plastic shelf in the garage.

50. On or about March 25, 2016, after receiving consent from the City of Naperville, law enforcement installed a pole camera in the vicinity of the **Subject Premises**, with a view of the **Subject Premises**. Law enforcement officers have reviewed portions of the video footage from the pole camera, including segments of the footage between approximately March 25, 2016 and May 10, 2016.<sup>32</sup> The review of the footage from approximately March 25, 2016 until April 10, 2016, revealed no activity at the **Subject Premises**.<sup>33</sup> On or about April 11, 2016, an associate of BIANCOFIORI, Individual F, and an unidentified female entered the **Subject**

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<sup>32</sup> The camera appears to zoom in on the **Subject Premises** at night, when it appears lighting is limited, and thus the view of the pole camera is more restricted.

<sup>33</sup> The camera angle between approximately March 25, 2016 and March 31, 2016, was positioned with a view higher up on the **Subject Premises**, and thus presented a more restricted view of the **Subject Premises**.

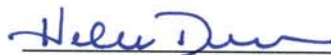
**Premises** with shopping bags, and subsequently exited the **Subject Premises** without the shopping bags. From approximately April 12, 2016, through approximately May 3, 2016, the review of the footage revealed no activity at the **Subject Premises**. Following May 3, 2016, law enforcement observed some activity on the footage review. First, on or about May 4, 2016, multiple individuals appear to enter and exit the **Subject Premises**, including Individual F, two minor individuals accompanying Individual F, a man who appeared to be a neighbor, and an alarm company representative. Other than shelving and what appeared to be cleaning supplies, which were removed by the neighbor, no items appear to have been removed from the **Subject Premises** by those individuals. Second, on or about May 7, 2016, May 8, 2016, and May 9, 2016, Individual F entered the **Subject Premises**, sometimes accompanied by an unknown female. Other than small personal bags, such as a purse and small bag, Individual F and the unknown female did not appear to carry anything outside of the **Subject Premises**. Based upon the limited nature of this activity at the **Subject Premises**, law enforcement believes that evidence of BIANCOFIORI's criminal activities, in violation of 18 U.S.C. § 1591, as described in Attachment B, will be found at the **Subject Premises**.



## CONCLUSION

51. Based on the above information, I respectfully submit that there is probable cause to believe that BIANCOFIORI has engaged in the sex trafficking of Victim A, Victim B, Victim C, Victim D, and Victim E, and others known and unknown, by force, fraud, and coercion, in 18 U.S.C. § 1951(a), and that evidence, instrumentalities, fruits, and contraband relating to this criminal conduct, as further described in Attachment B, will be found in the **Subject Premises**, as further described in Attachment A. I therefore respectfully request that this Court issue a search warrant for the townhouse located at 1913 Golden Gate Lane, Naperville, Illinois, more particularly described in Attachment A, authorizing the seizure of the items described in Attachment B.

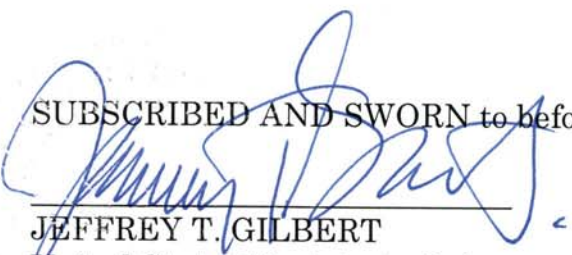
FURTHER AFFIANT SAYETH NOT.



HELEN DUNN

Special Agent, Federal Bureau of  
Investigation

SUBSCRIBED AND SWORN to before me on May 11, 2016.



JEFFREY T. GILBERT

United States Magistrate Judge